EXHIBIT C

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December 16, 2023

VIA ELECTRONIC CORRESPONDENCE

Justina K. Sessions
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601 Lexington Avenue, 31st Floor
New York, NY 10022

> Re: *Inform, Inc. v. Google LLC, et al,*
>   Case No. 1:21-cv-01530 (PKC)

Dear Ms. Sessions and Mr. McCallum:

We write to follow up on Inform's request for source code to be produced by Google for inspection.

We attach hereto Robert McCallum's email dated July 17, 2023 to Jason Zweig regarding Google's initial source code production. Inform is ready, willing and able to commence its review of all of this source code identified in this email. Before doing so, and in the interests of efficiency and minimizing the burdens on all parties, Inform requires additional code in order to prepare its case. Rather than requiring multiple trips and multiple productions, Inform believes it will be most efficient for its expert to review the relevant source code at one time.

As a result, Inform requests that Google produce the following additional code for inspection:

1. Algorithms responsible for the forecasting, delivery pattern, frequency and pacing of direct ad campaigns. Inform's SAC at Paragraphs 10, 67, 83, 229, 321.

2. "AdX Line Item Forecasting." Inform's Second Amended Complaint ("SAC") at Paragraphs 189-197, 198-212.

Ms. Justine K. Sessions
Mr. Robert J. McCallum
December 16, 2023
Page 2

3. Calculation of temporary CPM for Enhanced Dynamic Allocation. Inform's SAC at Paragraphs 198-212.

4. Algorithms related to overbooking of direct ad campaigns or preference for programmatic ads. Inform's SAC at Paragraphs 229-235, 236-239.

5. Algorithms used to implement or detect violations of TrueView Policy.   Inform's SAC at Paragraphs 262-266.

6. "Viewability" algorithm affecting whether an advertisement was not serviced despite its status in an auction. Inform's SAC at Paragraphs 262-266.

7. Algorithms implementing the serving or playing of video ads in a Chrome Browser or on YouTube and any related settings, including size of player, autostart, audibility, "intelligent pausing" of video ads for OLV ad platforms. Inform's SAC at Paragraphs 241-254, 255-261.

8. "High News Peak" or "News Spike" algorithms – this code should include any algorithms used by Google on days of high news traffic whereby Google accounts for and/or alters any manner in which ads are selected and placed. Inform's SAC at Paragraphs 229-235, 321.

Once Google confirms that it will make available for inspection this additional code, Inform will be in a position to coordinate its expert review. Given that the discovery in the MDL is set to conclude in the next six months, Inform requests that this code be produced at Google's earliest convenience.

Very truly yours,

/s/ JCH

John C. Herman

Enclosure

cc: MDL Discovery Steering Committee
      Serina Vash
      Candace Smith